

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
WESTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

Case No. 10CR251

Hon. JAMES G. CAR

vs.

Magistrate Judge VERNELIS K. ARMSTRONG

HOR I. AKL,  
AMERA A. AKL,

Defendant.

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**DEFENDANTS, HOR AKL AND AMERA A. AKL'S JOINT MOTION TO ALLOW  
THANKSGIVING DAY MODIFICATION OF BAIL CONDITIONS**

NOW COMES THE defendants, HOR I. AKL and AMERA A. AKL, by and through their attorneys, JEFFREY J. HELMICK and SANFORD A. SCHULMAN and states in support of their Joint Motion to Allow Thanksgiving Day Modification of Bail Conditions pursuant to 18 USCS § 3142 as follows:

1. On June 8, 2010 Magistrate Judge Vernelis K. Armstrong heard testimony and made a recommendation for an order releasing the defendant, AMERA AKL, on a \$750,000.00 property bond. The Government filed no objections and this Court entered an order adopting the recommendation.

2. On September 2, 2010 this Court heard testimony and considered the defendant, HOR I. AKL's Motion for Release on Bail Pending Trial and granted same.

3. The defendants have fully complied with all terms and conditions set forth by this Court.

4. The defendants are seeking an order to allow them the defendant, AMERA AKL, to come with her custodian to the marital home to spend Thanksgiving Day with the defendant HOR I. AKL, her husband, along with the custodians and the minor children.

5. The defendant have been together during court hearings as well as meetings with counsel at counsel's office and meetings with counsel at the marital home. There have been no violations or incidents.

6. The defendants are seeking an order amending the terms and conditions of bond to allow for a one time and one day visit by the defendant, AMERA AKL, to the marital home with the custodians present during a specific four hour period of time from 3:00 p.m. until 7:00 p.m.

7. Mark Miller of Pre-Trial Services has been apprised of the request and has suggested that a motion be filed.

8. The Government has been apprised of the request.

WHEREFORE, the defendants, HOR I. AKL and AMERA A. AKL, by and through their attorneys, JEFFREY J. HELMICK and SANFORD A. SCHULMAN and states in support of their Joint Motion to Allow Thanksgiving Day Modification of Bail Conditions as follows:

1. That the defendant, AMERA A. AKL, be permitted to be transported to the marital home on THURSDAY NOVEMBER 25, 2010 by her custodian;
2. That the defendant, AMER A AKL, be permitted to stay at the marital home in the presence of the guardian from 3 p.m. until 7 p.m.
3. That the guardian return AMERA A. AKL to her residence by 7 p.m.
4. That all previous terms and conditions remain in full force and effect and that this modification be only for this one day.

Respectfully submitted,

/s/ w/consent Jeffrey J. Helmick  
JEFFREY J. HELMICK  
Attorney for Defendant: HOR I. AKL  
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/s/ Sanford A. Schulman  
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Date: November 22, 2010

UNITED STATES DISTRICT COURT  
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WESTERN DIVISION

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**CERTIFICATE OF ELECTRONIC FILING WITH COURT**

SANFORD A. SCHULMAN, affirms, deposes and states that on the 22nd day of November, 2010, he did cause to be served electronically with the Clerk of United States District Court, Northern District of Ohio, Western District, using ECF system which will send notification of such filing to the following:

Hon. JAMES G. CAR  
JUSTIN E. HERDMAN  
Assistant US Attorney  
DUNCAN T. BROWN  
Assistant US Attorney  
THOMAS E. GETZ  
Assistant US Attorney

the following pleadings:

1. Joint Motion to Allow Thanksgiving Day Modification of Bail Conditions
2. Certificate of Electronic Filing.

Respectfully submitted,

s/Sanford A. Schulman P-43230

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